

WILMERHALE

June 5, 2012

Peter G. Neiman

By Facsimile

Hon. George B. Daniels
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

SO ORDERED:
George B. Daniels, U.S.D.J.

+1 212 295 6487(t)

+1 212 230 0088(f)

peter.neiman@wilmerhale.com

Dated: JUN 12 2012


Re: *United States v. A 10th Century Cambodian Sandstone Sculpture, Currently Located At
Sotheby's In New York, New York*, No. 12 Civ. 2600 (GBD)

Dear Judge Daniels:

We write on behalf of our clients Sotheby's, Inc. ("Sotheby's") and its consignor, Ms. Ruspoli du Poggio Suasa ("Ms. Ruspoli") in the above captioned litigation. Our clients intend to move on June 5, 2012 to dismiss the complaint pursuant to Supplemental Rule for Admiralty or Maritime Claims and Asset Forfeiture Actions G(8)(b)(i) and Federal Rule of Civil Procedure 12(b)(6). We intend to file a single brief in support of both clients. Because there are multiple independent bases for dismissing the complaint, we respectfully request leave to file a memorandum of law not longer than 30 pages in support of this motion.

We have conferred with Assistant U.S. Attorney Alex Wilson, counsel for the Plaintiff, who stated that he consents to this request.

Respectfully submitted,



Peter G. Neiman

cc: Counsel for the Plaintiff